

Kathleen Hartnett White, *Chairman*
R. B. "Ralph" Marquez, *Commissioner*
Larry R. Soward, *Commissioner*
Glefn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 15, 2004

Commanding Officer
Naval Air Station Corpus Christi
Attn: Ms. D. Byerly
Code 186
11001 D Street
Corpus Christi, Texas 78419

Re: Approval with comments of Response Action Plan Wells Installation Report, dated July, 2003 and May and August 2003 Quarterly Groundwater Sampling Report, dated February, 2004
Installation Restoration (IR) Site 1 (NOR Unit No. 1), IR Site 3 (NOR Unit No. 3), IR Site 4 (NOR Unit No. 4), and Building 8
U.S. Department of the Navy, Naval Air Station, Corpus Christi, Texas (NASCC)
TCEQ SWR No. 30479
TCEQ Hazardous Waste Permit No. HW-50038
EPA I.D. No. TX7170022787

Dear Ms. Byerly:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above referenced submittals. Based on our review, the TCEQ approves the submittals; however, comments are provided below concerning information required for future reports. No written response is required to this TCEQ letter.

1. Please ensure that the facility name, location, and the identification numbers in the TCEQ reference line above (TCEQ SWR NO., TCEQ Hazardous Waste Permit No., and EPA I.D. No.) are included on the cover of all written correspondence. These identifiers are used by the TCEQ for tracking purposes.
2. To document compliance with the Texas Professional Geoscience Act, the Remediation Division will not review reports and documents received on or after October 1, 2004 that contain unsealed geoscience services or work. Reports and documents with unsealed geoscience services or work will be returned to the submitting party. For further information, see the Texas Board of Professional Geoscientists website (<http://www.tbpg.state.tx.us>). Additional information is also available at <http://www.trcc.state.tx.us/permitting/remed/techsupp/PGReports.pdf> on the TCEQ web site. Please direct all questions regarding what constitutes geoscience to the Board (512/936-4400).
3. The TCEQ requests that Chemical of Concern (COC) concentrations be displayed on diagrams containing the locations of the sampled monitor wells in future groundwater monitoring reports.

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4. The TCEQ requests that the groundwater monitoring reports for Installation Restoration (IR) Sites 1, 3, and 4 discuss the performance of the IR Site cut-off trench system. Periods when the system is inoperative and repairs/modifications to the system, if any, should be noted.
5. Response Action Plan Wells Installation Report, pg. 9: The report indicates that the drilling subcontractor was responsible for notifying local and state agencies of monitor well abandonments, as well as completing all applicable forms and submitting them to appropriate agencies. Please note that following the completion of all response actions, the Navy will be required to submit proof that all monitor wells have been properly plugged and abandoned. This is necessary to confirm that all preferential pathways which may lead to contaminant migration have been addressed. The TCEQ recommends that the Navy retain copies of the plugging and abandonment reports for this purpose, as the reports may be difficult to obtain in the future.

An original and one copy of the revised RAP for Building 8 must be submitted to the TCEQ at the letterhead address using mail code number MC-127. An additional copy should be submitted to the TCEQ Region 14 Office in Corpus Christi. **The revised RAP must be received on or before January 15, 2005.** The facility name, location and identification numbers in the TCEQ reference line above should be included in your response.

Please call me at (512) 239-6791 if you need additional information or wish to discuss these comments or the due date. Thank you for your cooperation in this matter.

Sincerely,

Kenneth E. Davis

Kenneth E. Davis, P.G., Project Manager
Team III, Corrective Action Section
Remediation Division
Texas Commission on Environmental Quality

cc: Commanding Officer, Attn: Ms. Helen Lockard, SOUTHNAVFACENGCOM, Code ES33, P.O.
Box 190010, North Charleston, SC 29419-9010
Waste Program Manager, TCEQ Region 14 Office, Corpus Christi